

EXHIBIT H

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS PART H

X Index No.
LT-320098-24/KI

TIVOLI BI LLC

Petitioner-Landlord

-against-

LISA PRINCE

Respondent-Tenant.

NOTICE OF MOTION

Premises
49-47 Crown Street, #28L
Brooklyn, NY 11225

X

PLEASE TAKE NOTICE that upon the annexed affirmation of Lisa Prince; the annexed affirmation of Kailyn Gaines, Esq.; and the exhibits and schedules annexed thereto, LISA PRINCE (“Ms. Prince”) shall move this Court, in the Courthouse located at 141 Livingston Street, Brooklyn, NY 11201 in Part H, Room 507 and on March 4, 2025 at 9:30AM for an Order:

1. DISMISSING Petitioner’s nonpayment petition on summary judgment pursuant to CPLR 3212;
2. IMPOSING sanctions on Petitioner and its counsel for initiating a frivolous lawsuit against Ms. Prince; and
3. GRANTING any such other and further relief as the Court may deem just and proper.

Dated: March 4, 2025
Brooklyn, NY

Respectfully submitted,



BROOKLYN LEGAL SERVICES
by Kailyn Gaines, Esq.
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